



Mr. Richard H. Karney, P.E., Manager Energy Star Program Building Technologies Program Department of Energy Washington, DC 20685

March 27, 2003

Dear Mr. Karney,

This is per your request for comments on the potential revisions to the Energy Star criteria for windows, doors and skylights.

As one of the larger window manufacturers, we strongly support the "Three Zone" map structure over the "Four Zone". In trying to explain Energy Star and energy savings in general, it is already confusing to the consumer, and even confusing to some of our window dealers. To make the system more complex, with more zones, would go a long way in defeating the effectiveness of the system. The Energy Star program is to reduce energy usage, which means both heating and cooling, and the three zone structure best addresses total savings.

Please stay with the three zone map.

Sincerely,

President & CEO